IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re the application of: Liang *et al*.

Application number: 09/767,365

Filed: January 22, 2001

For: SCALABLE DERIVATIVE SERVICES

Attorney Docket No.: 2006579-0558 (CTX-199)

Art Unit: 2176

Confirmation No.: 2538

Examiner: Tran, Quoc A.

Commissioner for Patents P.O. Box 1450 Alexandria, VA 22313-1450

AMENDMENT AND RESPONSE TO NON-FINAL OFFICE ACTION

Dear Madam:

INTRODUCTORY COMMENTS

This Amendment and Response is filed responsive to the non-final Office Action dated November 5, 2008. In view of the comments set forth below, Applicants respectfully urge reconsideration, withdrawal of the outstanding rejections and allowance of the claims.

Amendments to the Claims are reflected in the listing of claims which begin on page 2 of this paper.

Remarks/Arguments begin on page 7 of this paper.